

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

*

*

VS

*

NO. 03-CR-10385-RGS

*

KIRK RINALDI

*

MOTION TO CONTINUE TRIAL DATE

The defendant, Kirk Rinaldi, moves to continue the trial date of his case from June 11, 2007, to July 16, 2007, or such other date in July 2007 as may be convenient to the court, for the following reasons:

Defense counsel in recent days, and as late as Friday, June 1, 2007, has received hundreds of pages of pretrial discovery from the government and needs additional time to copy and submit them to the defendant, who is incarcerated at MCI Cedar Junction, and to have opportunity to further consult with defendant regarding their contents, not only for trial preparation but also to further discuss a possible resolution of the case which may preclude the need for a trial.

The defendant agrees that the time between the originally scheduled date for trial, of June 11, 2007, and July 16, 2007, or such other date in July 2007 that may be scheduled for trial, may be excluded from the time standards in effect regarding this case.

The government has telephonically assented to this request for continuance.

June 4, 2007

/s/ Karnig Boyajian
Karnig Boyajian (BBO#052080)
Defendant's Attorney
One Gateway Center, Suite 315
Newton, MA 02458
Tel. 617-332-222
Fax. 617-332-2221